

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**JEFFREY CABE, SEAN FREY, ANITA
POTEETE, RONDA ROHDE, ROBERT
SNELL, JEFFREY MOORE and ELISA
TINNELL, MICHAEL KAP, KAREN
ROBERTSON, JIM WESTRA, JOHNNY
RUIZ, ARCHIE ROBINSON, DECODA
KEYS and NORMA MOODY, Each
Individually and on Behalf of All Others
Similarly Situated,**

Plaintiffs,

v.

**EVERGREEN PACKAGING LLC and
PACTIV EVERGREEN INC.,**

Defendants.

Case No. 1:24-CV-01316

Hon. John Robert Blakey

Hon. Jeffrey T. Gilbert

**DECLARATION OF MEGAN TAYLOR IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION**

I, Megan Taylor, hereby declare as follows:

1. I am over 18 years of age and competent to testify as to the matters in this Declaration. I have personal knowledge of the facts set forth in this declaration, or I have knowledge of such facts based on my review of the business records and files of Pactiv LLC (the "Company" or "Pactiv"). If called as a witness, I could and would testify competently to such facts contained herein.

2. I am the Human Resources Manager at Pactiv LLC's Mineral Wells, West Virginia location. As the Human Resources Manager, I am responsible for enforcing policies, payroll, employee relations, hiring, staffing, compliance, project management, and more.

3. The Mineral Wells facility operates 24 hours a day, 7-days a week. We are a non-union facility and manufacture and produce deli containers and egg cartons. Production workers work on twelve-hour shifts of either 6:00 am to 6:00 pm or 6:00 pm to 6:00 am. A small subset of the maintenance department operates on eight-hour shifts.

4. The Mineral Wells facility utilizes a 7-minute grace period for the start and end of employee shifts. This timekeeping practice allows employees to punch-in no more than 7-minutes prior to their scheduled shift-start time and no more than 7-minutes after the end of the scheduled shift time. Employees are not required to work, and to my knowledge, do not perform any work between the time they punch in, and the time of their scheduled shift start.


5. Due to the location of our timeclocks, no employee is able to begin working until they have punched in. I am unaware of any complaints from employees, including Decoda Keys and Jeffrey Moore, about working during the 7-minute grace period window. The 7-minute grace period is meant to provide a short window of time for employees to punch-in so that they are prepared to begin their work at the start of their scheduled shift time.

6. I am unaware of any employees performing work off-the-clock and no employee has complained to me about working off-the-clock at any point during my tenure with the Company. I recall that Mr. Jeffrey Moore and Decoda Keys worked at the Mineral Wells facility. There is no record of Mr. Moore or Mr. Keys ever making a complaint of not getting paid for all of their work or of having to perform off-the-clock work.

7. If there is ever any issue with a missed punch or time adjustment, an employee can notify a supervisor, who will then adjust the time accordingly. The employee's time is then changed to reflect the hours they worked.

I hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge and that I would so testify if called upon to do so in this matter.

Executed this 28 day of June 2024 in Mineral Wells, West Virginia.



Megan Taylor